FERTITTA REYNAL, L.L.P.

May 31, 2019

VIA ECF
The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Jeffrey Shulse, et al., No. 1:16-cr-640-BMC

Dear Judge Cogan:

We represent Jeffrey Shulse in the above-captioned case. We respectfully request that Mr. Shulse's bond conditions be modified to allow him to travel with his wife to San Diego from June 20 to June 23, 2019 to celebrate their 20th wedding anniversary.

We have discussed this requests with Pretrial Services and the government, and neither objects.

Respectfully submitted,

/s/ F. Andino Reynal

cc: All counsel of record via ECF
Melissa Siberon, U.S. Pretrial Services, via email